

Hon. Jamal N. Whitehead

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

IN RE: VALVE ANTITRUST LITIGATION

**Case No. 2:21-cv-00563-JNW**

**DECLARATION OF NICHOLAS C.  
LARSON IN SUPPORT OF UBISOFT,  
INC.'S JOINDER IN VALVE  
CORPORATION'S MOTION TO SEAL  
PORTIONS OF SUMMARY JUDGMENT  
FILINGS THAT CONTAIN UBISOFT,  
INC.'S CONFIDENTIAL INFORMATION  
AND UBISOFT'S MOTION TO  
MAINTAIN SUCH INFORMATION  
UNDER SEAL**

**DECLARATION OF NICHOLAS C. LARSON**

I, Nicholas C. Larson, declare as follows:

1. I am an attorney duly licensed to practice in both the States of Washington and California and am a partner with Murphy, Pearson, Bradley & Feeney, P.C., counsel for Ubisoft, Inc. ("Ubisoft"). The facts stated herein are known to me personally and, if called as a witness, I could and would testify competently thereto under oath.

2. Ubisoft produced documents in response to subpoenas served upon it by Valve Corporation ("Valve") and Wolfire Games, LLC ("Plaintiff") in this action. Ubisoft designated such documents as Highly Confidential – Attorneys' Eyes Only under the Protective Order (Dkt. 95). No party has challenged Ubisoft's designations.

3. As further set forth in his declaration filed herewith, my co-counsel, Stephen Smith, met and conferred with counsel for both Valve and Plaintiffs concerning the subject matter of the instant Joinder and Motion. There are 12 references to Ubisoft-designated material that are part of Valve's motion to seal. They are identified in Ubisoft's Joinder and Motion and in the Declaration of Olivier Ernst filed in support of that Joinder and Motion. Ultimately, all parties that have any interest in the Ubisoft-designated material have no disagreement about such materials remaining under seal as Valve presents it now, in its current motion to seal.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 21, 2025, at Seattle, WA.



Nicholas C. Larson